

S.D. Warren Company)	Department
Cumberland County)	Findings of Fact and Order
Westbrook, Maine)	Part 70 Air Emission License
A-29-70-C-A)	Amendment #2

After review of the Part 70 Administrative Revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to Chapters 115 and 140 and to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	S.D. Warren Company Westbrook Mill (S.D. Warren)
LICENSE NUMBER	A-29-70-A-I
LICENSE TYPE	Part 70 License Administrative Revision
NAICS CODES	322121
NATURE OF BUSINESS	Papermill
FACILITY LOCATION	Westbrook, Maine
INITIAL LICENSE ISSUANCE DATE	December 31, 2003
AMENDMENT ISSUANCE DATE	September 21, 2005
LICENSE EXPIRATION DATE	December 31, 2008

B. Nature of Revision Request

S.D. Warren of Westbrook, Maine has requested an Administrative Revision of their current Part 70 Air Emission License to update the BPT determination for PM emissions from the #20 Coater catalytic incinerator and to eliminate the ton/yr particulate matter (PM) emissions restriction for the catalytic incinerator associated with the operation of the facility's #20 Coater machine.

C. Application Classification

Part 70 Administrative Revision procedures may be used for a revision of state-only requirements at a facility with a licensed emissions increase under four (4) tpy for any one regulated pollutant and under eight (8) tpy of total regulated pollutants, and is determined not to be a Major or Minor Modification of a Part 70 source, a Part 70 Major or Minor Change, and is greater than an insignificant activity as defined in Chapter 140. The elimination of the 3.99 ton/yr PM restrictions for the #20 Coater catalytic incinerator has been processed as a Part 70 administrative revision and meets the requirements of such.

D. Justification for Revision Request

S.D. Warren's #20 Coater catalytic incinerator was originally given a PM emission restriction of 0.12 pounds per hour (lb/hr). After having tested the incinerator for PM emissions, at the Department's request, it was found that emissions were much higher than originally expected, due to catalyst attrition rates higher than originally expected. S.D. Warren requested and received an Administrative Revision to their Part 70 Air Emission License (A-29-70-B-A, issued in November, 2004) to increase the hourly PM restrictions for the #20 Coater catalytic incinerator from 0.12 lb/hr to 4.0 pounds per hour and establish an annual PM emissions restriction of 3.99 tons per year (ton/yr). In conjunction with the PM emissions restriction increases, the Administrative Revision issued to S.D. Warren required biennial testing for PM emissions from the catalytic incinerator, the establishment of a maintenance, inspection and repair program, the creation and maintenance of an operations log and the requirement to undertake a program to develop feasible approaches to further reduce PM emissions from the incinerator.

PM emission testing for the catalytic incinerator, conducted in October 2004, resulted in findings that average PM emissions rates were approximately 2.1 lbs/hr, far above the originally licensed limit of 0.12 lb/hr. As noted above, Administrative Revision A-29-70-B-A corrected the PM emissions restriction from the catalytic incinerator to 4.0 lb/hr and to limit annual PM emissions to no greater than 3.99 ton/yr. Re-testing of PM emissions from the catalytic incinerator, conducted in March, 2005, resulted in average PM emissions rates of approximately 0.9 lb/hr, well less than the currently permitted limit of 4.0 lb/hr.

Since the issuance of the Administrative Revision A-29-70-B-A, S.D. Warren has found that there are catalysts on the market with greater attrition resistance than that of the currently utilized catalyst. One particular catalyst, AOK-75-41, developed by Matros Technologies, has an attrition resistance of twice that of the currently used catalyst. S.D. Warren has proposed to satisfy the requirement of undertaking a program to develop feasible approaches to further reduce PM emissions from the catalytic incinerator by changing the catalyst currently utilized to a catalyst with greater attrition resistance and, in the future, purchasing either AOK-75-71 catalyst from Matros Technologies or a catalyst with similar or greater attrition resistance.

Based on the new testing information and the new alternative catalyst information, the Department has determined that it is appropriate to eliminate the 3.99 ton/yr at this time. The Department has determined BPT shall be an hourly PM emission rate restriction from the catalytic incinerator of 3.0 lb/hr and continued use of a clean-burning fuel (i.e. natural gas).

S.D. Warren Company)	Department
Cumberland County)	Findings of Fact and Order
Westbrook, Maine)	Part 70 Air Emission License
A-29-70-C-A	3	Amendment #2

Upon review of the renewal of the S.D. Warren of Westbrook Part 70 Air Emission License (A-29-70-A-I), the PM emission restrictions for the #20 Coater catalytic incinerator will again be reviewed and a determination of any emissions restrictions changes and/or testing schedule changes will also be done.

E. Facility PM Emissions

Corrected Total Annual Licensed PM Emissions for the Facility

<u>Pollutant</u>	Emissions in Tons/Year						
	<u>#17, #18, #20 and #21 Boilers</u>	<u>Diesels #2 and #4</u>	<u>Tech. Center Boiler</u>	<u>#35 Research Coater Dryer</u>	<u>#20 Coater and Catalytic Incinerator</u>	<u>#2 Coater and 4th Zone Dryer</u>	<u>Total</u>
PM/PM ₁₀	523.0	37.7	0.2	0.4	11.0	0.7	573.0

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources

The Department hereby grants Part 70 Administrative Revision A-156-70-B-A, subject to the conditions found in Part 70 Air Emission License A-156-70-A-I, Part 70 Air Emission License Amendment A-156-70-B-A and the following conditions:

The following shall replace Condition (25), paragraph J, in Air Emissions License A-29-70-A-I:

- (25) J. Emissions from the #20 Coater catalytic incinerator shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority
PM	3.0	MEDEP Chapter 140, BPT
PM ₁₀	3.0	MEDEP Chapter 140, BPT
SO ₂	0.006	MEDEP Chapter 140, BPT
NO _x	1.0	MEDEP Chapter 140, BPT
CO	1.8	MEDEP Chapter 140, BPT

S.D. Warren Company)	Department
Cumberland County)	Findings of Fact and Order
Westbrook, Maine)	Part 70 Air Emission License
A-29-70-C-A	4	Amendment #2

The following shall replace Condition (25), paragraph M. in Air Emissions License A-29-70-A-I:

(25) M. S.D Warren shall no longer be subject to Condition (25), paragraph M of Air Emission License Annual A-29-70-A-I. This condition is found in Air Emission License Administrative Revision A-29-70-B-A. [MEDEP Chapter 140, BPT]

The following shall be in addition to Condition (25) in Air Emissions License A-29-70-A-I:

(25) P. S.D. Warren Shall purchase and utilize either AOK-75-71 catalyst from Matros Technologies or a catalyst with similar or greater attrition resistance for use in the #20 Coater catalytic incinerator.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2005.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

This license shall expire concurrently with license A-29-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 17, 2005

Date of application acceptance: April 25, 2005

Date filed with the Board of Environmental Protection _____

This Order prepared by Peter G. Carleton, Bureau of Air Quality.